

IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
Bid Protest

(Electronically Filed on May 6, 2022)

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CELLEBRITE, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. <u>22-308 C</u>
	)	
THE UNITED STATES	)	Judge _____
	)	
Defendant.	)	
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**MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, Cellebrite, Inc. (“Cellebrite”), hereby respectfully requests leave of the Court to file under seal the Complaint that accompanies this motion, the Motion for Preliminary Injunction, and the proposed redacted versions of each document. These documents contain confidential and proprietary information, the disclosure of which is likely to cause serious competitive harm to Cellebrite. Likewise, until it is agreed by the parties to be a final redacted document suitable for public release, the proposed redacted versions of the Complaint and Motion for Preliminary Injunction similarly run the risk of containing confidential and proprietary information, the disclosure of which is likely to cause serious competitive harm to Cellebrite. Accordingly, in Cellebrite’s view, leave to file the Complaint, the Motion for Preliminary Injunction, and the proposed redacted versions of each document is necessary in order to safeguard against the disclosure of confidential and proprietary information.

Additionally, because Cellebrite has previously protested this procurement at the Government Accountability Office (“GAO”), certain information and material in this matter before the Court is currently covered by a GAO protective order. The terms of the GAO

protective order information require Cellebrite to seek leave to file documents containing protected information under seal with the Court, to inform the Court of the GAO's protective order, and to request that the Court issue its own protective order to cover the protected material.

Therefore, please note that Cellebrite is filing herewith a Motion for a Protective Order requesting that the Court issue a standard Protective Order in this matter consistent with U.S. Court of Federal Claims Form 8 (Protective Order in Procurement Protest Cases) to safeguard the proprietary and confidential information of the parties to this litigation that is likely to be disclosed orally and/or in writing during the course of this matter.

May 6, 2022

Respectfully submitted,

s/ Aron C. Beezley

Aron C. Beezley

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